

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

_____	)	
United States of America,	)	
Plaintiff	)	
	)	
v.	)	
	)	Civil No. 14-275-LM
Nine Thousand Four Hundred Fifty One	)	
Dollars (\$9,451.00) in U.S. Currency,	)	
more or less, seized from Christopher Ranfos,	)	
et al.,	)	
Defendants <i>in rem</i> .	)	
_____	)	

**ASSENTED TO MOTION TO EXTEND DEADLINE TO FILE NOTICE OF CLAIM**

NOW COMES Potential Claimant, Jonathan Venturini, by and through counsel, Shaheen & Gordon, P.A., moving to extend the deadline to file a notice of claim, and, in support thereof, states as follows;

1. On or about August 22, 2014, the United States filed this civil action. The Complaint alleges that Jonathan Venturini may have an interest in certain property identified as a defendant in rem -- \$41,290.00 in U.S. Currency and a 2008 Harley Davidson FLHR motorcycle.
2. On or about August 28, 2014, the United States issued a Notice of Forfeiture Complaint to undersigned counsel on behalf of Potential Claimant, Jonathan Venturini. The Notice states the deadline to file a Claim on behalf of Mr. Venturini is October 2, 2014.
3. Mr. Venturini is also a defendant in United States v. Venturini, 14-CR-85-JD. Trial in that matter is currently scheduled for the two week period commencing November 4, 2014.

4. Mr. Venturini requests an enlargement of time to file a Notice of Claim in this matter to November 3, 2014. The requested continuance will result in a more efficient use of resources for both the parties and the Court.

5. Undersigned counsel as conferred with Assistant United States Attorney Robert Rabuck who advises the United States assents to the relief sought herein.

6. Do the nature of the relief sought; no memorandum of law is required.

WHEREFORE, Potential Claimant, Jonathan Venturini, respectfully requests that this Honorable Court:

- a. Grant the within motion;
- b. Enlarge the deadline to file a Notice of Claim to November 3, 2014; and
- c. Grant such further relief as the Court deems necessary, just and fair.

Respectfully submitted,

Jonathan Venturini  
By His Attorneys:  
SHAHEEN & GORDON, P.A.

Dated: September 30, 2014

/s/ William E. Christie  
William E. Christie  
NH Bar #11255  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

DATED: September 30, 2014

/s/ William E. Christie

William E. Christie

NH Bar No. 11255